

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: :
Thomas M. Johnson, III, : BK. NO. 10-01151 RNO
Debtor :
: :
Citibank, N.A., not in its individual : CHAPTER 11
Capacity, but solely as trustee of NRZ :
Pass-Through Trust VI, :
Movant :
: :
v. :
: :
Thomas M. Johnson, III, :
Respondent :
:

ANSWER TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY

AND NOW COMES, Debtor, Thomas M. Johnson, III, by and through his undersigned counsel, answering the Motion for Relief from the Automatic Stay as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Denied. Strict proof thereof is demanded at trial.
6. Denied. Strict proof thereof is demanded at trial.
7. Denied. The loan documents speak for themselves.
8. Denied. Since Movant has not specified the priority of Movant's lien relative to

any other liens against the property, pursuant to Local Bankruptcy Rule 4001-1(d)(2). Debtor may have equity in the property which would provide adequate protection to Movant.

9. Denied. The averment contains a conclusion of law.

WHEREFORE, Debtor respectfully requests Movant's Motion for Relief from the Automatic Stay to be denied.

Respectfully submitted,

LAW OFFICES OF CRAIG A. DIEHL

Date: September 6, 2017

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